

IN THE CIRCUIT COURT FOR Henry COUNTY, ALABAMA

Johnny Grace
Petitioner,

CASE NO: CC 02-205 + ZDL

VS.

STATE OF ALABAMA,
Henry County,

MOTION FOR RECONSIDERATION OF SENTENCE AND STRUCTURE

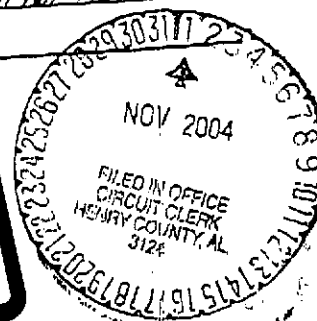
COMES NOW, Johnny Grace, Pro-Se Petitioner in the above styled and Numbered Cause, who hereby Moves this Honorable Court to Review and give Reconsideration of Sentence to this Petitioner for the following reasons:

JURISDICTION

- A) Code of Alabama 1975 15-18-8, Alabama Split Sentence Act.
- B) Code of Alabama 1975 15-22-50, Authority of any Circuit or District Court to Suspend Sentence and Place Convicted person on Probation.

STATEMENT OF FACTS

- 1. The Petitioner was sentenced on January 23, 2002 to a term of 19 1/2 Years, and has now served 7 1/2 Years.
- 2. Petitioner has accomplished the following while Incarcerated:
SAP, Anger Management, 90th's After care in both bond
structure dorm, no-disciplinaries



CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THIS 26 DAY OF October 2004.
SERVED A COPY OF THIS THE FOREGOING (INCLUDING EXHIBITS), ON THE PLAINTIFFS
BY PLACING SAID COPY IN THE UNITED STATES MAIL, FIRST CLASS, POSTAGE PREPAID
AND ADDRESSED AS FOLLOW: District Attorney and
Circuit Clerk of Henry County, Al.

Respectfully Submitted,

Johndy Grace
AIS# 227106 Dorm 3017T
Ventress Correctional Facility
P.O. BOX 767
Clayton, Alabama 36016

3. Petitioner would show, that he has a sound home and job plan, and has put his past mistakes behind him and is asking for the opportunity to prove that he can be a productive member of society.

RELIEF SOUGHT

Petitioner would respectfully request that this Honorable Court, review the accomplishments that this Petitioner has and Modify, Amend or Suspend the originally imposed sentence of 19 1/2 Years to a term of Split sentence and/or banishment from state, with credit for all time served and to be Concurrent with any sentences he may be serving.

THEREFORE, for the reason's stated herein, this Petitioner prays for the relief sought at this time.

Respectfully Submitted,

DATED: October 26, 2004

James Grace
AUSA # 0227106 dorm 3D17T
Ventress Correctional Facility

P.O. Box 767

Clayton, Al. 36016